

Equality Impact Assessment Template – Policy, function or strategy

This document should be completed when a new policy, function or strategy is introduced or when a substantive change to an existing policy, function or strategy is recommended.

1. Policy, function or strategy		
a.	Name/description of the policy, function or strategy ¹	Anti-Fraud and Corruption Policy 2024
b.	Responsible organisation(s)/Lead Service	Internal Audit
c.	Lead Officer	Chief Internal Auditor
d.	Date of Impact Assessment	25 November 2024
e.	Partners/other Services involved in the development of the policy, function or strategy	Legal, Democratic, Digital and Customer Services and the Corporate Management Team (CMT)
f.	Is the policy, function or strategy?	<input type="checkbox"/> New
		<input checked="" type="checkbox"/> Reviewed/Revised
g.	What is the purpose of the policy, function or strategy (include details of any new legislation which prompted the introduction of the policy, function or strategy or the substantive change to the policy, function or strategy)?	<p>This Policy provides an overview of the arrangements in place to develop and maintain an anti-fraud and corruption culture within the Council which encourages fraud prevention, promotes detection and provides an effective process for reporting and investigating suspected acts of fraud.</p> <p>The Policy is split into the following sections:</p> <ul style="list-style-type: none"> • Culture • Prevention

¹ Please attach details of the policy, function or strategy to this Template

Classification : Official

		<ul style="list-style-type: none"> • Deterrence • Detection and Investigation • Training. <p>The Policy has been reviewed in line with introduction of the Criminal Finances Act 2017 Policy, and updated reference to The Data Protection Act 2018/UK General Data Protection Regulation.</p>
h.	What are the intended outcomes of the policy, function or strategy?	The Policy is intended to minimise fraud losses and ensure that roles and responsibilities are clear and all parties are aware of what is expected of them.
i.	Geographical area (Inverclyde-wide or a specific location)	Inverclyde-wide
j.	Which parts of the Equality Duty will the policy, function or strategy impact on?	<input type="checkbox"/> Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by The Equality Act 2010
		<input type="checkbox"/> Advance equality of opportunity between people of different groups
		<input type="checkbox"/> Foster good relations between people from different groups
k.	Will those who may be directly or indirectly affected by the policy, function or strategy be involved in its development?	No.

2. Does the policy, function or strategy impact on:		
	Yes	No
a. Protected Characteristics under The Equality Act 2010:		X

Classification : Official

Age; Care experienced; Disability; Gender Reassignment; Marriage and Civil Partnership; Pregnancy and Maternity; Race; Religion and Belief; Sex; Sexual Orientation (see Section 3)		
b. Reducing inequalities of outcome caused by socio-economic disadvantage – Fairer Scotland Duty ² (see Section 6)		X
c. Inverclyde Alliance Partnership Plan 2023/33 ³ (see Section 7)		X
d. Council Plan 2023/28 ⁴ (see Section 8)	X	
3. If 'Yes' is selected for any part of Section 2, please populate the other relevant Sections of this Template.		
4. If 'No' is selected for <u>every part</u> of Section 2, please state the reasons for this.		
<p>Please sign below and email a copy of this Template to Karen Barclay, Corporate Policy and Performance Officer: karen.barclay@inverclyde.gov.uk</p>		
Signature:	Date:	

3. Impact – Protected Characteristics

² [Fairer Scotland Duty: guidance for public bodies](#)
³ [Inverclyde Alliance Partnership Plan 2023/33](#)
⁴ [Council Plan 2023/28](#)

Which of the Protected Characteristics will the policy, function or strategy have an impact upon?						
Protected Characteristic	Impact					Reasons/Comments
	Positive High	Positive Low	Neutral	Negative High	Negative Low	
Age			X			
Care experienced			X			
Disability			X			
Gender Reassignment			X			
Marriage and Civil Partnership			X			
Pregnancy and Maternity			X			
Race			X			
Religion and Belief			X			

Classification : Official

Sex			X			
Sexual Orientation			X			
Other groups to consider						
<ul style="list-style-type: none"> • Carers • The Armed Forces Covenant Duty 			X			
			X			

4. Which parts of the Equality Duty will the policy, function or strategy have an impact upon?	
<input type="checkbox"/>	Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by The Equality Act 2010
<input type="checkbox"/>	Advance equality of opportunity between people from different groups
<input type="checkbox"/>	Foster good relations between people from different groups

5. Impact – Groups

Classification : Official

From the information you have highlighted above, describe the positive and negative impacts and the groups affected under The Equality Act 2010.

Positive impact

+

(Describe groups affected.)

Negative impact

-

(Describe groups affected.)

6. Impact – Fairer Scotland Duty

What impact will the policy, function or strategy have on reducing inequalities of outcome caused by socio-economic disadvantage?

Positive impact +	Neutral impact =	Negative impact -
	=	
<p>Briefly describe how the policy, function or strategy will impact on reducing inequalities of outcome.</p>		

7. Impact – Inverclyde Alliance Partnership Plan 2023/33

Which Themes from the Inverclyde Alliance Partnership Plan 2023/33 will the policy, function or strategy impact on?

<input type="checkbox"/>	<p>Theme 1: Empowered people</p> <ul style="list-style-type: none"> • Communities can have their voices heard, and influence the places and services that affect them • Gaps in outcomes linked to poverty are reduced
<input type="checkbox"/>	<p>Theme 2: Working people</p> <ul style="list-style-type: none"> • More people will be in sustained employment, with fair pay and conditions • Poverty related gaps are addressed, so young people can have the skills for learning, life and work • Businesses are supported and encouraged to reduce their carbon footprint and develop green jobs
<input type="checkbox"/>	<p>Theme 3: Healthy people and places</p> <ul style="list-style-type: none"> • People live longer and healthier lives • Supportive systems are in place to prevent alcohol and drug misuse

Classification : Official

	<ul style="list-style-type: none">• Our natural capital is looked after, and we are effectively adapting and mitigating the effects of climate change
<input type="checkbox"/>	Theme 4: A supportive place <ul style="list-style-type: none">• Vulnerable adults and children are protected and supported, ensuring they can live safely and independently• We recognise where people are affected by trauma, and respond in ways that prevent further harm and support recovery• Public protection and community safety are improved through targeting our resources to reduce the risk of offending and harm
<input type="checkbox"/>	Theme 5: A thriving place <ul style="list-style-type: none">• Growth in our working age population by encouraging people to stay here, and attracting new people to settle here• Development of strong community-based services that respond to local need• Homes are energy efficient and fuel poverty is reduced• Increased use of active travel and sustainable transport options• Easy access to attractive and safe public spaces, and high-quality arts and cultural opportunities
Briefly describe how the policy, function or strategy will impact on the Inverclyde Alliance Partnership Plan 2023/22 Themes.	

8. Impact – Council Plan 2023/28

Which Themes from the Council Plan 2023/28 will the policy, function or strategy impact on?

<input type="checkbox"/>	Theme 1: People <ul style="list-style-type: none">• Our young people have the best start in life through high quality support and education• Gaps in outcomes linked to poverty are reduced• People are supported to improve their health and wellbeing• More people will be in employment, with fair pay and conditions• Our most vulnerable families and residents are safeguarded and supported
<input type="checkbox"/>	Theme 2: Place <ul style="list-style-type: none">• Communities are thriving, growing and sustainable

Classification : Official

	<ul style="list-style-type: none">• Our strategic housing function is robust• Our economy and skills base are developed• We have a sufficient supply of business premises• Our natural environment is protected
X	Theme 3: Performance <ul style="list-style-type: none">• High quality and innovative services are provided, giving value for money• Our employees are supported and developed

Briefly describe how the policy, function or strategy will impact on the Council Plan 2023/28 Themes.

Theme 3: The implementation of the Policy will support the Council's aim to provide excellent public services and to ensure propriety and accountability in all matters.

9. Evidence

What evidence do you have to help identify any potential impacts of the policy, function or strategy?

Note: Evidence could include information from consultations, surveys, the Citizens’ Panel, focus groups, interviews, projects, user feedback, complaints, Officers’ knowledge and experience, equalities monitoring data, publications, research, reports, and local and national groups.

Evidence	Details
Consultation/engagement (including any carried out while developing the policy, function or strategy)	The CMT was consulted during the development of the Policy and its feedback has been incorporated into the final version of the document.
Research	The following document was reviewed: <ul style="list-style-type: none"> • CIPFA Code of Practice on Managing Risk of Fraud and Corruption.
Officers’ knowledge and experience (including feedback from frontline staff)	The Officers involved in the development of the Policy have many years of relevant experience.
Equalities monitoring data	
User feedback (including complaints)	
Stakeholders	
Other	

Are there information gaps and, if so, what are these?	No.

10. Consequences of Analysis

What steps will you take in response to the findings of your analysis? Please select at least one of the following and provide a brief explanation.

a.	Continue development with no changes	X	While it is difficult to predict with complete accuracy, it is not currently expected that any changes will be required to the Policy.
b.	Continue development with minor alterations	<input type="checkbox"/>	
c.	Continue development with major changes	<input type="checkbox"/>	
d.	Discontinue development and consider alternatives (where relevant)	<input type="checkbox"/>	

How will the effect of the policy, function or strategy be monitored following implementation?

All investigations relating to the Policy are signed off by the Chief Internal Auditor who also liaises with management to recommend changes in procedures to reduce risks and prevent losses to the Council. When fraud or corruption has occurred due to breakdown in or absence of the Council’s system of internal control, Directors will ensure that appropriate control improvements are implemented in order to prevent a re-occurrence.

<p>When is the policy, function or strategy due to be implemented?</p> <p>Following approval by the Audit Committee at its meeting on 7 January 2025.</p>
<p>When will the policy, function or strategy be reviewed?</p> <p>2028, unless legislative or other requirements bring this forward.</p>
<p>What resources are available for the implementation of the policy, function or strategy? Have these resources changed?</p> <p>Managers at all levels are responsible for the communication and implementation of this Policy in their work area. The implementation of the Policy will be supported by current resources.</p>

11. Please use the space below to detail any other matters arising from the Equality Impact Assessment process, including what action could be taken to mitigate the impact of the policy, function or strategy.

This document should be cross-referenced with the Equality Impact Assessments relating to the Whistleblowing (Confidential Reporting) Policy, the Code of Conduct (Employees), the Corporate Debt Recovery Policy 2023 and the Inverclyde Council Criminal Finances Act 2017 Policy.

Details of the Person(s) who completed the Assessment:	
Name:	Andi Priestman
Position:	Chief Internal Auditor
Date:	9/12/2024
Authorised by:	
Name:	Alan Puckrin
Position:	Chief Financial Officer
Date:	9/12/2024

Please send a copy of the completed Template to Karen Barclay, Corporate Policy and Performance Officer at karen.barclay@inverclyde.gov.uk.